

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.:
2005 CV 11080 GAO

JANE DOE,
Plaintiff,

v.

SHERIFF OF ESSEX COUNTY, d/b/a ESSEX
COUNTY CORRECTIONAL ALTERNATIVE
CENTER; FRANK G. COUSINS, JR., individually
and in his official capacity; ANDOVER HOUSING
AUTHORITY, and CHRISTINE METZEMAEKERS,
individually and in her official capacity,

Defendants.

ANSWER TO CROSSCLAIM BY DEFENDANTS
ANDOVER HOUSING AUTHORITY AND
METZEMAEKERS.

1. The Defendants admit the allegations of paragraphs 1, 2, and 3.

Count I.

2. In response to paragraph 4, the Defendants repeat and incorporate by reference their responses to paragraphs 1-3.
3. The Defendants admit, in response to paragraph 5, that the complaint so alleges, but deny they have committed the actions alleged.

4. The Defendants deny the allegations of paragraph 6 and further state that the counterclaim plaintiff is not entitled to the relief requested.

Count II.

5. In response to paragraph 7 the Defendants repeat and incorporate by reference their responses to paragraphs 1-6.
6. The Defendants deny the allegations of paragraph 8 and further state that the counterclaim plaintiff is not entitled to the relief requested.

Affirmative Defenses.

7. The Defendants repeat and incorporate by reference all affirmative defenses plead by them or any other defendant in response to the complaint in this case.

THE DEFENDANTS CLAIM A TRIAL BY JURY ON ALL ISSUES.

By their attorneys,

CURLEY & CURLEY, P.C.

/s/ Martin J. Rooney

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CERTIFICATE OF SERVICE

I, Martin J. Rooney, Esq., hereby certify that I served by first class mail, postage prepaid, a true and correct copy of the foregoing pleading to the following counsel of record: Jeffrey S. Beeler, Esq., Heinlein & Beeler, PC, 207 Union Street, S. Natick, MA 01760; and Steve Frost, Esq., Merrick Louison & Costello, LLP, 67 Batterymarch St., Boston MA 02110.

DATE 7/6/05

/s/ Martin J. Rooney

Martin J. Rooney, Esq.

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